



**CONTRA COSTA  
WATER DISTRICT**

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**CALFED Bay-Delta Program**

August 16, 2000

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**Director**  
California Department of Water Resources  
P.O. Box 942836, Room 1115-1  
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**Subject: CALFED Bay-Delta Program Record of Decision**

Dear Mr. Snow and Mr. Hannigan:

Contra Costa Water District (CCWD) has reviewed the Final Programmatic Environmental Impact Statement/Environmental Impact Report ("FPEIS/EIR") for the CALFED Bay Delta Program, released late July 2000. CCWD has noticed a major omission in the FPEIS/EIR regarding the Veale and Byron Tract drainage reduction projects that needs to be corrected in the Record of Decision.

The June 9, 2000 CALFED Framework for Action, under South Delta Actions (page 19), contains the following language:

(4) Reduce agricultural drainage in the Delta. Actions to reduce such drainage will include early implementation of projects on Veale and Byron tracts to reduce or relocate major sources of drainage into South Delta channels. The purpose of these projects is to minimize elevated salinity and other constituents of concern to drinking water at urban intakes in the South Delta. These projects will be completed prior to completion of the installation of permanent barriers in Old River near the San Joaquin River, Grantline Canal, Old River near Tracy and Middle River and before SWP pumping can increase to its full capacity of 10,300 cfs.

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The Framework for Action specifically ties completion of the Veale Tract and Byron Tract projects to South Delta Conveyance actions. These drainage reduction actions are vital to the maintenance of water quality at CCWD's intakes in light of the adverse impacts of the South Delta Conveyance actions. The FPEIS/EIR should include the Veale Tract and Byron Tract actions in the Implementation Plan under South Delta Conveyance actions, i.e., there should be an additional action on page 2-17:

Complete Veale Tract and Byron Tract drainage reduction projects prior to completion of the installation of permanent barriers in South Delta and before SWP pumping is increased to its full capacity of 10,300 cfs (yr 1-5).

There is a reference in the Implementation Plan under Drinking Water Quality to an action to "*Implement source controls in the Delta and its tributaries (yr 1-7+)*" (see page 2-6 of the Implementation Plan). This statement would cover the Veale and Byron Tract actions. However, it lacks specificity and does not clearly state the important linkage between the Veale and Byron Tract actions and South Delta actions called for in the June 2000 Framework for Action.

The other mention of the Veale Tract and Byron Tract actions in the FPEIS/EIR is under the Water Quality Program Plan (see pages 3-22 and 3-22). However, these references focus on total organic carbon reduction and not on reducing or eliminating these sources of salinity and pathogens. The references are only to potential projects and pilot studies by others that are supported by CALFED and not to actions required by the Framework for Action.

The CALFED Bay-Delta Program's Record of Decision and State Certification must make clear that the FPEIS/EIR includes the Veale and Byron Tract projects by requiring that these agricultural drainage reduction projects be completed prior to both the installation of permanent barriers in Old River or the proposed increase in SWP pumping to 10,300 cfs. Specific milestones and sources of funding must also be identified to ensure that these actions are completed prior to the South Delta actions.

Suggested language for Record of Decision:

Veale Tract and Byron Tract actions to reduce agricultural drainage in the Delta

Actions to reduce agricultural drainage will include early implementation of projects on Veale Tract and Byron Tract to reduce or relocate major sources of drainage into South Delta channels. The purpose of these projects is to minimize elevated salinity and other constituents of concern to drinking water at urban intakes in the South Delta. These projects will be completed prior to completion of the installation of permanent barriers in Old River near the San Joaquin River, Grantline Canal, Old River near Tracy and Middle River and before SWP pumping can increase to its full capacity of 10,300 cfs.

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- Complete funding plan by early 2001
- Complete environmental study and design of Byron Tract water quality solution by September 2001
- Complete construction of Byron Tract solution by end of 2002
- Complete environmental documentation and permits for Veale Tract solution by September 2003
- Complete construction of Veale Tract water quality solution by end of 2005
- Develop long-term regional solution to reduce pollutant loads by end of 2006

If you have any questions, please contact me at (925) 688-8034 or Richard Denton, Water Resources Manager, at (925) 688-8187.

Sincerely,



Walter J. Bishop  
General Manager

RAD/LMH

cc: Steve Ritchie, Acting Executive Officer, CALFED Bay-Delta Program ✓  
Steve Macaulay, Chief Deputy Director, DWR